

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**CRAIG D. PERCIAVALLE  
JOSEPH A. RUNKEL  
WILLIAM O. ADAMS**

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**Criminal No. 23-cr-00070-JB-N**

**JOINT MOTION FOR ENTRY OF REVISED SCHEDULING ORDER**

In accordance with the Court's July 11, 2024 Order directing the parties to "confer and file a joint document setting out any proposed changes to the Court's October 5, 2023 scheduling order" [Doc.119, PageID.481], the United States and Defendants Craig Perciavalle, Joseph Runkel, and William Adams respectfully move the Court to enter a revised scheduling order adopting the following deadlines:

1. The parties request that the United States be given until **March 14, 2025** to file any notice under Federal Rule of Evidence 404(b)(3), and that Defendants be given until **March 28, 2025** to file any briefs objecting to such notices.

2. The parties request that Defendants be given until **November 22, 2024** to file all dispositive pretrial motions (meaning any pretrial motions seeking dismissal of any or all charges, whether in whole or in part), with any response brief due 14 days after the filing of a motion, and any reply brief due 14 days after the filing of any response brief.

3. The parties request that the parties be given until **April 18, 2025** to file all other pretrial motions under Federal Rule of Criminal Procedure 12(b), 14, and

16; all notices or demands under Federal Rule of Criminal Procedure 12.1, 12.2, and 12.3, and S.D. Ala. CrLR 12.5 (entrapment); and any motion to compel, with any response brief due 14 days after the filing of a motion, and any reply brief due 14 days after the filing of the response brief.

4. The parties request that Defendants be given until **April 4, 2025** to disclose all expert witness information and materials required by Federal Rule of Criminal Procedure 16(b)(1)(C).<sup>1</sup> The parties also request that the United States be given until **May 16, 2025** to disclose all rebuttal expert witness information and materials required by Federal Rule of Criminal Procedure 16(a)(1)(G). The parties further request that they be given until **June 13, 2025** to file challenges to expert witnesses, including *Daubert* motions, with any response brief due 14 days after the filing of a motion, and any reply brief due 7 days after the filing of the response brief.

5. The parties request that they be given until **August 15, 2025** to file motions *in limine*, with any response brief due 14 days after the filing of a motion, and any reply brief due 7 days after the filing of the response brief.

6. The parties request that they be given until **August 15, 2025** to file proposed jury instructions and voir dire questions.

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<sup>1</sup> The parties note that Defendants have agreed to provide the United States a preliminary list of then-known or anticipated potential testifying experts, as well as limited information about the general subject matter of their expected areas of testimony, no later than February 28, 2025 so that the United States may begin locating and engaging rebuttal experts.

7. The parties request that the Court set status conferences during the months of October 2024, March 2025, June 2025, and September 2025 to address any issues that may arise as this case progresses.

Dated: August 11, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2024, I filed electronically the foregoing with the Clerk of the Court using the Court's CM/ECF system, thereby serving this filing on all attorneys of record in this case.

*/s/ T. Hart Benton, III*

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T. Hart Benton, III